

9-2-97

Chat -

Comments on Mo TSD Letter Received 9/1/87

1. I understand the TSD universe being defined is one for RCRA program, permit and compliance, and not the compliance inspection universe which is a subset of the MUTSD universe. Thus, I recommend the following:

- revise letter to state Mo TSD universe specifying that permit status is given per C1115 and compliance status, the compliance status is given by noting that a facility is excluded from the compliance inspection universe on the Facility List and the reason for the compliance exclusion is given in the letter.

See revised page 1 + 2 for suggested revisions.

- include brief discussion in letter that a facility remains in TSD universe until all permitting actions and/or unresolved questions or administrative actions are taken by lead agency and/or by mutual agreement

See revised page 1 + 2 for suggested revision.

Thus, a number of facilities which are excluded from compliance universe should be included in TSD universe List. Based on information from the letter, BLS's notes etc., the TSD outside compliance interests but still in TSD list are given below and noted on the attached list of facilities



R00100341

RCRA RECORDS CENTER



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY

REGION 7
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

WASTE MANAGEMENT DIVISION

April 27, 1989

Dave -

I have re-drafted the response to Jane's letter. I wanted to get it to you for further discussion. I see you have scheduled a meeting with Jane and Mary Jo.

Let me know what you think.

Thanks,

Marc

Kenneth J. Davis
Chief, Data Management Unit
Waste Management Program
Division of Environmental Quality
Department of Natural Resources
P. O. Box 176
Jefferson City, Missouri 65102

Dear Mr. Davis:

I am writing to confirm the outcomes of my March 1, 1989 meeting with you and other Missouri staff members, John Doyle, Dan Tschirgi and Tom Judge, and follow up telephone conversations with you on the the Missouri universe of Treatment Storage and Disposal (TSD) facilities. The Environmental Protection Agency (EPA) permit and compliance staffs agree with the outcomes of our meeting as discussed below.

1. General Agreement on Missouri TSD Universe

The enclosed Hazardous Waste Data Management System (HWDMS) TSD Universe Report is complete in terms of the TSD facilities which both agencies agree are currently regulated under the Federal hazardous waste program. The changes to the TSD universe as a result of our March discussions are given below in Item 3. Both agencies recognize that the regulatory status of some of the facilities on the enclosed TSD universe list need to be confirmed. The facilities to be investigated are discussed below in Item 4.

2. Change Request Procedures

Changes to the TSD Universe can be initiated by either Missouri and/or EPA staff during a TSD review meeting.
RCRA/RADM EAGER:CL 5/12/89 TSD389.WS4

RADM

PRMT

RCOM

STPG

RATCLIFFE
WALLERSTEDT

HARRINGTON
STEWART

DOYLE
RIVAS

STEWART
WHEELER

92R
5-23-89

LH
5/24/89
May 23rd, 1989

An EPA or State staff member may also initiate a change by completing and submitting the enclosed change request form along with supporting documentation to the respective TSD Coordinator, Joe Davis or Jane Ratcliffe. The TSD Coordinator will submit the request to the other agency for its concurrence.

At this time, the EPA is the responsible agency for updating the appropriate HWDMS data components. The EPA TSD Coordinator will update HWDMS only after both EPA and Missouri parties agree to the changes by initialing or signing a completed change request form and/or a confirmation letter on the outcomes of an EPA - State TSD universe meeting and/or conference call.

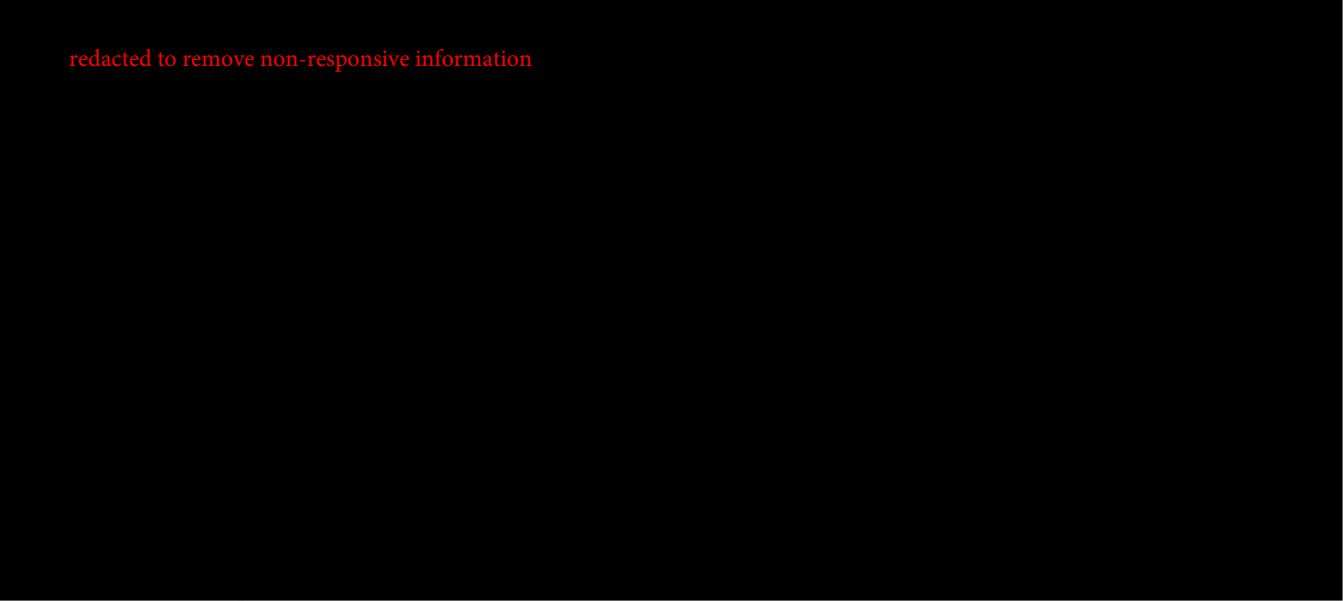
The EPA and/or Missouri staff can obtain a copy of the HWDMS Missouri TSD Universe Report through the Region VII's HWDMS Report Menu. The TSD Universe Report is Report No. 13 under Option 2, Selectable Reports. The Where Clause for the Report is "C305 exists and C2 eq MO:".

3. Current TSD Universe Updates

The EPA permit and compliance staffs have reviewed and concur on Missouri's requested changes to the TSD universe. We have updated HWDMS accordingly. The enclosed HWDMS TSD Universe Report reflects these changes. The TSD universe changes are as follows:

redacted to remove non-responsive information

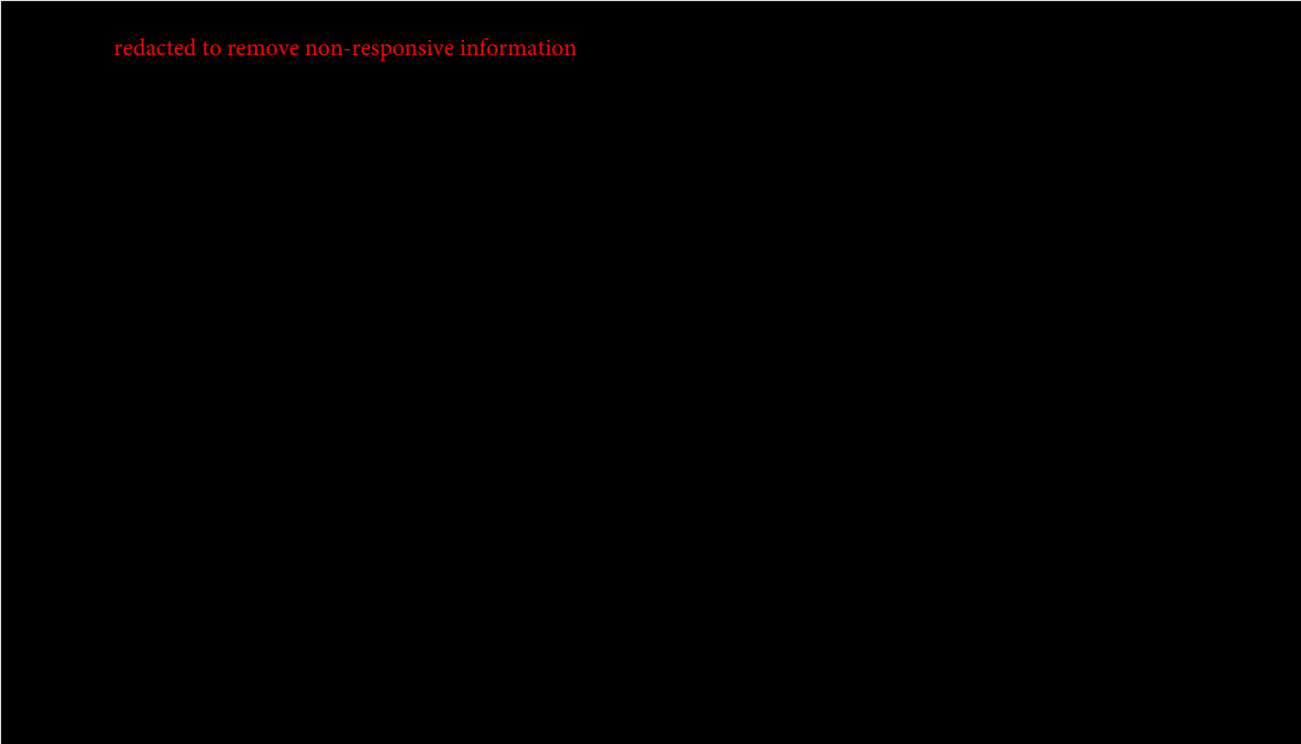
redacted to remove non-responsive information



4. TSD Facilities To Be Investigated

The EPA permit and compliance staff members agree with the State's list of facilities whose regulatory status needs to be investigated. The State will conduct the investigations with assistance from the EPA staff, as requested. July 31, 1989 is the target date for completing this work. The list of facilities to be investigated along with a brief statement of the issue is given below.

redacted to remove non-responsive information



- Safety Kleen Corporation (5-085-02) MOD000669077
- Safety Kleen Corporation (5-160-02) MOD096714829

At our November meeting Sandy Carroll explained that these two facilities closed in the early 1980's prior to the implementation of the current closure procedure requirements. Dan Tschirgi agreed that the MDNR Permit Unit would review the closure to ensure that the facilities closed in compliance with the regulations.

5. Facility Status Information

redacted to remove non-responsive information

I suggest that we hold the next TSD review meeting in mid- July to review the status of the facilities identified for further investigation and the response to the 1988 Part B call-in for changes in their HWDMS permit status.

Please contact me at 913-236-2852, if you have any questions on these matters.

Sincerely yours,

Jane E. Ratcliffe, Ph.D.
HWDMS Regional Project Officer

Enclosure

cc: John Doyle, MDNR w/TSD Universe Report
Art Groner, MDNR w/TSD Universe Report
Sandy Carroll, MDNR w/TSD Universe Report
Dan Tschirgi, MDNR w/TSD Universe Report
Roy Brower, MDNR w/TSD Universe Report

bcc: Lynn Harrington/Bob Stewart w/ TSD Universe Report
Dave Doyle/Marc Rivas w/TSD Universe Report
Bob Stewart/Dan Wheeler w/TSD Universe Report

ROUTING AND TRANSMITTAL SLIP		Date
		8-27
TO: (Name, office symbol, room number, building, Agency/Post)	Initials	Date
1. <i>Mama</i>		
2. <i>RLS</i>		
3. <i>Chet</i>		
4. <i>Dave</i>		
5. <i>Mama</i>		
Action	File	Note and Return
<input checked="" type="checkbox"/> Approval	<input checked="" type="checkbox"/> For Clearance	<input checked="" type="checkbox"/> For Conversation
<input type="checkbox"/> As Requested	<input checked="" type="checkbox"/> For Correction	<input type="checkbox"/> Prepare Reply
<input type="checkbox"/> Circulate	<input type="checkbox"/> For Your Information	<input type="checkbox"/> See Me
<input type="checkbox"/> Comment	<input type="checkbox"/> Investigate	<input type="checkbox"/> Signature
<input type="checkbox"/> Coordination	<input type="checkbox"/> Justify	

REMARKS

Chet - I have redrafted letter
page 1, 2, 5 for your consideration

I would be pleased to meet
w/you to discuss my proposed
revisions

041-1296
114

John R 8-2-87

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)	Room No.—Bldg.
<i>R</i>	Phone No.

